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7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 MICHELLE M. THOMPSON,

11 Plaintiff,

12 vs.

13 SAFEWAY, INC., a California corporation  
14 doing business in Washington State and  
JOHN/JANE DOES 1-10,

15 Defendants.  
16

No. 3:21-cv-5788

NOTICE OF REMOVAL TO  
FEDERAL COURT

17 Please take notice that Defendant Safeway Inc. hereby removes to the United  
18 States District Court for the Western District of Washington the action described below.  
19 On August 4, 2021, Defendant Safeway Inc. was served with a summons (**Attachment 1**)  
20 and complaint (**Attachment 2**) in an action entitled *Michelle M. Thompson v. Safeway,*  
21 *Inc.*, Thurston County Superior Court No. 21-2-01314-34. The first date upon which  
22 Safeway Inc. received a copy of this complaint was August 4, 2021.

23 The complaint does not specify the amount of damages being claimed by the  
24 Plaintiff. On August 10, 2021, Safeway propounded a request for a statement of  
25 damages which asked Plaintiff to disclose the damages Plaintiff is claiming in this matter.

NOTICE OF REMOVAL TO  
FEDERAL COURT - 1

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Turner Kugler Law, PLLC

6523 California Ave SW #454  
Seattle, WA 98136  
(206) 659-0679

1 On October 12, 2021, in response to this request, Plaintiff notified Safeway that Plaintiff  
2 is claiming damages in excess of \$75,000.

3 There is complete diversity because the Plaintiff is a citizen of the State of  
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws to the  
5 State of Delaware with its principle place of business in the State of California. The other  
6 “defendants” are fictitious.

7 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)  
8 because it is between citizens of different states and the amount in controversy exceeds  
9 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.  
10 §1441 based on diversity jurisdiction.

11 Safeway filed a jury demand in state court (**Attachment 3**).

12 **INTRADISTRICT ASSIGNMENT**

13 The case is currently pending in Thurston County so LCR 3(e) indicates it will be  
14 initially assigned to a Tacoma Judge.

15 A civil case cover sheet is attached as **Attachment 4**.

16 Dated: October 22, 2021.

17 TURNER KUGLER LAW, PLLC

18 By: s/ John T. Kugler  
19 John T. Kugler, WSBA # 19960  
Attorney for Defendant Safeway Inc.



**CERTIFICATE OF SERVICE**

I hereby certify that on October 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff:  
Matthew G. Johnson  
Ron Meyers  
Tim Friedman  
Ron Meyers & Associates PLLC  
8765 Tallon Ln NE, Ste. A  
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(360) 459-5600  
[matt.j@rm-law.us](mailto:matt.j@rm-law.us)

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

s/ John T. Kugler  
JOHN T. KUGLER, WSB #19960  
Attorney for Defendant Safeway Inc.  
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